



September 11, 2020

The Honorable Andrew Wheeler, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Mail Code 1101A
Washington, DC 20460

Sent Via E-mail to wheeler.andrew@epa.gov

Dear Administrator Wheeler,

The Wilbur-Ellis Company is a family-owned business founded 100 years ago. Through our Agribusiness Division we are a leading U.S. marketer and distributor of agricultural products, solving production problems for farmers from 200+ locations in over 25 states.

We also market and sell dicamba tolerant (DT) cotton and soybean seed as well as the dicamba formulations designed and registered to be used in over the top (OTT) applications on these crops.

Soybean and cotton harvest is well underway throughout the U.S. Simultaneously, growers are already planning for 2021 to include planting decisions as well as weed control options.

Without question, DT cotton and soybeans represent superior genetics with industry-leading performance characteristics. That's why growers will be purchasing DT cotton and soybean seed next year regardless of EPA's decision to grant a registration for low volatility dicamba formulations intended for OTT applications. Whether those dicamba products will be available is still an open question. Therefore, we urge the Agency to renew these registrations as soon as possible in order to provide clarity to growers across the U.S.

Having these products available over the last four years has been a critical factor in controlling glyphosate resistant weeds. Successful weed resistance management programs need access to multiple modes of action to prevent weed resistance from becoming a recurring and persistent issue. Without dicamba, growers will likely return to a combination of pre-emergence and post-emergence herbicides in an effort to control weeds managed by a single application of dicamba.



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This has been a tumultuous year for all of agriculture. Going into 2021, it's important that growers have regulatory certainty to allow for proper planning and execution of their weed control strategies. That's why these dicamba product registrations need to be renewed as soon as possible so growers can make decisions for the 2021 crop year.

Thank you for considering this request.
Sincerely,

Scott Rawlins

National Director, Regulatory and Governmental Affairs
Wilbur-Ellis Company



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